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August 30, 2019

VIA ELECTRONIC FILING

The Honorable Ona T. Wang
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Ex Parte Application of Iraq Telecom Limited for an Expedited Order to Take
Discovery Pursuant to 28 U.S.C. § 1782, Case No. 1:18-mc-0458 (LGS) (OTW)

Dear Judge Wang:

Pursuant to Your Honor's August 13, 2019 Order (ECF #47) in the above-captioned action (the "**Order**"), Petitioner Iraq Telecom Limited ("**Iraq Telecom**"), together with nonparties (1) Citibank, N.A., (2) HSBC Bank USA, N.A., (3) Standard Chartered Bank, New York Branch, (4) The Bank of New York Mellon, and (5) Wells Fargo Bank, N.A. (collectively, the "**Banks**"), respectfully submit this joint letter regarding the status of Rule 45 subpoenas authorized by the Order.

Between August 14, 2019 and August 15, 2019, Iraq Telecom served the subpoenas upon the Banks. In conformance with the Order, in the intervening two weeks, Iraq Telecom and each of the Banks have conferred regarding various matters related to the subpoenas, and are actively engaged in efforts to develop parameters designed to assist the Banks in their search efforts. Each of the Banks has agreed to serve Responses and Objections to the subpoenas and, if reasonably practicable and without waiver of any objections it may have, conduct searches intended to identify responsive information and make a preliminary production of responsive information on or before September 12, 2019, or on another date as reasonably agreed to between Iraq Telecom and the Banks. Iraq Telecom and the Banks will continue to confer in an effort to reach agreement on the production of materials in satisfaction of the subpoenas.

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The Honorable Ona T. Wang
August 30, 2019

Respectfully submitted,

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cc: All counsel of record via ECF